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**FONTAINE****TRAILER COMPANY**

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February 12, 2003

Heidi L. Coleman  
 Assistant Chief Counsel for General Law  
 Office of Chief Counsel  
 NCC-30  
 National Transportation Safety Administration  
 400 7<sup>th</sup> Street SW  
 Room 5219  
 Washington, DC 20590

RECEIVED  
 FEB 27 P 4:23  
 CHIEF  
 COUNSEL

Dear Ms. Coleman,

Fontaine Trailer Company is a manufacturer of flatbed and lowbed trailers, primarily. We are in direct competition with other manufacturers who may or may not produce other types of trailers (e.g. Vans, Reefers, etc...).

The TREAD Act requires us to submit production data for the past ten years to establish a baseline, and then to submit quarterly production data beginning August 30, 2003. We are requesting that this data be treated as confidential for the following reasons:

1. In the past, monthly production data was submitted to the US bureau of Census and was considered confidential. No one could obtain data on individual companies. The Census Bureau published the total number of trailers produced in any given category. If insufficient numbers were reported for any category, that category was not included in the summary. This insured that any company's response remained confidential. We feel that this method of treatment of data has been successful while still maintaining confidentiality.
2. Some independent companies and private economic forecasting firms also collected production data on a voluntary basis. This data was available only to member clients and only in aggregate form. Individual company production data was kept strictly confidential.
3. We are a privately held company and in the past have not been required to submit production data to any government agency. We do not publish production data, but rather consider it as highly confidential information.
4. The trailer industry is very competitive. Availability of production data by individual companies would disclose information to our competitors that would identify sales trends or moves within our product lines that would be detrimental to our competitive



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standing in the industry. The vast majority of our product offerings are produced on manufacturing lines that are specifically geared to a particular product. In the event that a competitor acquires information on our past months production, the possibility exists for them to re-align their production lines to then take business away from us before we could "re-tool" our production lines.

For the above reasons, Fontaine requests NHTSA treat as confidential all production data submitted by our company, and release this data only as required and then only as part of the aggregate totals.

Sincerely,



Kelly Diet, President

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NATIONAL ARCHIVES